


Bisogno & Meyerson, LLP.
7018 Fort Hamilton Parkway
Brooklyn, New York, 11228

APPLICATION GRANTED
SO ORDERED 
VERNON S. BRODERICK
U.S.D.J. 9/7/2021

The parties are hereby directed to file a joint status update letter and, if applicable, a proposed summary judgment briefing schedule by on or before October 14, 2021.

September, 3 2021

Hon. Judge Vernon S. Broderick
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Courtroom 518
New York, New York 10007

Re: Deanna Reiss v. National Railroad Passenger Corp. (Amtrak)
19-CV-1780 (VSB)

Honorable Judge Broderick:

After a careful review of this file after receiving it from prior counsel, we have determined that we require further discovery. The undersigned has spoken to counsel for Amtrak and advised her of the items we are seeking. We further advised counsel that this office would serve upon Amtrak further discovery demands on Tuesday, September 7, 2021.

In light of the above, we are requesting an extension of the September 3, 2021 deadline for the parties to submit a joint status update letter and proposed summary judgment briefing schedule. Amtrak's counsel consents to this request but reserves its right to object to Plaintiff's additional discovery demands upon receipt of same.

Respectfully,

Patrick F. Bisogno
Bisogno & Meyerson, LLP